

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Robert P. Goe – State Bar No. 137019 Reem J. Bello – State Bar No. 198840 GOE FORSYTHE & HODGES LLP 17701 Cowan, Suite 210, Building D Irvine, CA 92614 RGoe@goeforlaw.com RBello@goeforlaw.com Telephone: (949) 798-2460 Facsimile: (949) 955-9437	FOR COURT USE ONLY
<input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Joseph Vago and Erica Vago	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION	
In re: LESLIE KLEIN <div style="text-align: right;">Debtor(s).</div>	CASE NO.: 2:23-bk-10990-SK ADVERSARY NO.: 2:23-ap-01150-SK CHAPTER: 11
JOSEPH VAGO, and ERICO VAGO, individuals, <div style="text-align: right;">Plaintiff(s).</div> <div style="text-align: center;">vs.</div> LESLIE KLEIN, individual, <div style="text-align: right;">Defendant(s).</div>	<div style="text-align: center;"> JOINT STATUS REPORT [LBR 7016-1(a)(2)] </div> <div style="padding-top: 10px;"> DATE: 12/20/2023 TIME: 9:00am COURTROOM: 1575 ADDRESS: 255 E. Temple Street Los Angeles, CA 90012 </div>

The parties submit the following JOINT STATUS REPORT in accordance with LBR 7016-1(a)(2):

A. PLEADINGS/SERVICE:

- | | | |
|---|---|--|
| 1. Have all parties been served with the complaint/counterclaim/cross-claim, etc. (Claims Documents)? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Have all parties filed and served answers to the Claims Documents? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Have all motions addressed to the Claims Documents been resolved? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Have counsel met and conferred in compliance with LBR 7026-1? | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

5. If your answer to any of the four preceding questions is anything other than an unqualified "YES," please explain below (*or on attached page*):
Defendant, Leslie Klein, was required to file his answer on or before November 18, 2023. Defendant, Leslie Klein, filed his answer late on December 5, 2023, as such, the parties have not yet met and conferred in this case.

B. READINESS FOR TRIAL:

1. When will you be ready for trial in this case?
November 6, 2024 Plaintiff Defendant
2. If your answer to the above is more than 4 months after the summons issued in this case, give reasons for further delay.
Chapter 11 trustee was appointed. Defendant changed counsel and then his counsel withdrew. Defendant filed his answer late on December 5, 2023.
Plaintiff Defendant
3. When do you expect to complete your discovery efforts?
September 29, 2023 Plaintiff Defendant
4. What additional discovery do you require to prepare for trial?
Admissions, interrogatories, document production and depositions.
Plaintiff Defendant

C. TRIAL TIME:

1. What is your estimate of the time required to present your side of the case at trial (*including rebuttal stage if applicable*)?
1-2 days Plaintiff Defendant
2. How many witnesses do you intend to call at trial (*including opposing parties*)?
5-10 witnesses Plaintiff Defendant

3. How many exhibits do you anticipate using at trial?

Plaintiff
25-50

Defendant

D. PRETRIAL CONFERENCE:

A pretrial conference is usually conducted between a week to a month before trial, at which time a pretrial order will be signed by the court. [See LBR 7016-1.] If you believe that a pre-trial conference is not necessary or appropriate in this case, please so note below, stating your reasons:

Plaintiff

Pretrial conference ☒ is ☐ is not requested

Reasons:

To narrow issues for trial

Defendant

Pretrial conference ☐ is ☐ is not requested

Reasons:

Plaintiff

Pretrial conference should be set after:

(date) 10/27/2023

Defendant

Pretrial conference should be set after:

(date) _____

E. SETTLEMENT:

1. What is the status of settlement efforts?

No settlement discussions have taken place.

2. Has this dispute been formally mediated? ☐ Yes ☒ No
If so, when?

3. Do you want this matter sent to mediation at this time?

Plaintiff

☐ Yes ☒ No

Defendant

☐ Yes ☐ No

F. FINAL JUDGMENT/ORDER:

Any party who contests the bankruptcy court's authority to enter a final judgment and/or order in this adversary proceeding must raise its objection below. Failure to select either box below may be deemed consent.

Plaintiff

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

Defendant

☒ I do consent

☐ I do not consent

to the bankruptcy court's entry of a final judgment and/or order in this adversary proceeding.

G. ADDITIONAL COMMENTS/RECOMMENDATIONS RE TRIAL: (Use additional page if necessary)

Respectfully submitted,

Date: 12/05/2023

Goe Forsythe & Hodges LLP

Printed name of law firm

/s/Robert P. Goe

Signature

Robert P. Goe

Printed name

Attorney for: Joseph and Erica Vago

Date: 12/6/2023

LSLAF KLFIN

Printed name of law firm

LSLAF KLFIN

Signature

LSLAF KLFIN

Printed name

Attorney for: LSLAF KLFIN

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
17701 Cowan, Suite 210, Irvine, CA 92614

A true and correct copy of the foregoing document entitled: **JOINT STATUS REPORT [LBR 7016-1(a)(2)]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 12/07/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/07/2023
Date

Susan C. Stein
Printed Name

/s/Susan C. Stein
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Mailing Information for Case 2:23-ap-01150-SK

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Reem J Bello** rbello@goeforlaw.com, kmurphy@goeforlaw.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- **Michael I. Gottfried** mgottfried@elkinskalt.com,
cavila@elkinskalt.com,lwageman@elkinskalt.com,docketing@elkinskalt.com
- **Brian A Procel** bprocel@millerbarondess.com,
rdankwa@millerbarondess.com;docket@millerbarondess.com
- **Nikko Salvatore Stevens** nikko@cym.law, mandi@cym.law
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Clarisse Young** youngshumaker@smcounsel.com, levern@smcounsel.com